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**Review Comments on
Montgomery Watson's Response to USEPA Comments on the
Revised Pre-Design Quality Assurance Project Plan
American Chemical Services, Inc.**

General Comments

Comment No. 1,

During review of the Revised Pre-Design Quality Assurance Project Plan, it was noted that a large number of the USEPA's comments were not addressed (i.e., Comments 2, 3, 6, 8, 9, 11, 32, 40, 41, 42, 58, 60, 77 and 90). Therefore, it appears that Montgomery Watson's Response to USEPA Comments on the Revised Pre-Design Quality Assurance Project Plan is incomplete.

Comment No. 2,

The PRPs have not complied with three main topics which the USEPA has considered a priority:

- The SOW requirement that residential wells be sampled immediately.
- The use of pumps rather than bailers for groundwater sampling.
- The requirement that groundwater samples for metals analysis be unfiltered.

The PRPs non-responsiveness towards these three topics accounted for almost all of the "not addressed" comments noted in General Comment No. 1.

Comment No. 3,

In general, the Revised Pre-Design Quality Assurance Project Plan conforms to the Region V Model QAPjP.

Comment No. 4,

It is the responsibility of the PRPs to select analyses of all matrices such that they are able to detect constituents below the performance standards set forth in the ROD, SOW and UAO Tables 7 and 8 for groundwater and soil, and below the cleanup standards to be determined for sediments.

Comment No. 5,

Due to the preponderance of instances of PRP non-responsiveness on major issues cited by the USEPA in both the Pre-Design work plan and Pre-Design QAPjP,



it is not possible to provide formal approval of these documents until all matters of concern to the Agencies have been resolved.

Comment No. 6,

BVWS recommends performing lower aquifer water level measurements at a time when ACS is pumping their onsite production wells to determine the impact of these wells on groundwater flow within the lower aquifer. To this end, it is recommended that at least one monitoring be installed in relatively close proximity to these onsite production wells.

Specific Comments

Comment 1, Section 1, Paragraph 1, Lines 10 and 11, Page 4 of 7

The stated goals of the Tracer investigation in the vicinity of MW-6 "is to determine of contamination from the Town of Griffith underground storage tanks has impacted MW-6." Regardless of whether the MW-6 groundwater has been "impacted" by other sources, the SOW, ROD and UAO clearly state that the PRPs are responsible for the cleanup of groundwater above the performance standards set forth in Table 7 of the ROD.

Comment 2, Section 1, Page 5 of 7, Bullet 2

The goals of the lower aquifer investigation are not to "determine the vertical extend of VOC impacts in the vicinity of MW-9" as stated in the text. Revise the text to state the following: "Define the vertical and horizontal extent of groundwater that exceeds the performance standards set forth in Table 7 of the ROD."

Comment 3, Section 1.5, Paragraph 1, First Sentence, Page 6 of 7

The sentence does not mention frequency as does the USEPA Region V Model QAPjP. The sentence should read, "A summary of sample matrices, analytical parameters and frequencies can be found in Table 1-1."

Comment 4, Section 5, Paragraph 1, Third Sentence, Page 1 of 4

In order to conform to the USEPA Region V Model QAPjP, the sentence should read: "It is U.S. EPA and Region V policy to follow the U.S. EPA Region V sample custody, or chain...."

Comment 5, Section 6.1, Paragraph 4, First Sentence, Page 1 of 2

In order to conform to the USEPA Region V Model QAPjP, the following sentence should be added: "Calibration of field instruments will be performed at the intervals specified by the manufacturer or more frequently as conditions dictate."

Comment 6, Table 1-3

In order to conform to the USEPA Region V Model QAPjP, the following sentence should be added: "Calibration of field instruments will be performed at the intervals specified by the manufacturer or more frequently as conditions dictate."

Comment 7, Table 1-3

The table notes that detection/compliance monitoring will be based on TCL VOCs. Revise the table to indicate that compliance samples will be analyzed for those chemicals presented in Table 7 of the ROD.

Comment 8, Appendix A, Section 2, Page 3, Bullet 3

Revise the bullet to state the following: "Lower Aquifer-Vertical and Horizontal Investigation."

Comment 9, Appendix A, Section 3.1.1, Page 5, Bullet 7

Revise Bullet 7 to state the following: "The eighth step will involve presenting the results to the Agencies. After Upper Aquifer plume delineation has been completed to the satisfaction of the Agencies, a proposed quarterly monitoring program will be presented in a Technical Memorandum."

Comment 10, Appendix A, Section 3.1.2, Page 6, Bullet 2

Revise the bullet to state the following: "Determine the vertical and Horizontal Extend of Lower aquifer groundwater exceeding the performances standards presented in Table 7 of the ROD."

Comment 11, Section 3.1.2, Page 6, Bullet 3

As a result of the anticipated proper response to comment no. 10 , delete bullet 3.

Comment 12, Appendix A, Section 3.1.2, Page 6, Paragraphs 2-5

The specific details of the lower aquifer investigation, as presented in the cited paragraphs, cannot be established until water levels have been obtained to the satisfaction of the Agencies, and investigatory profile boring locations have been selected. Therefore, delete paragraphs 2 through 5 of the cited page.

Comment 13, Appendix A, Section 3.2

Residential well sampling must be conducted immediately in order to comply with the UAO, SOW and ROD. Revise this section accordingly.

Comment 14, Appendix A, Section 3.4, Page 9, Paragraph 2

The abandoned well ATMW-4D must be replaced because it is located in an area of the lower aquifer shown to exceed the performance standards as presented in Table 7 of the ROD. Revise the paragraph to state that a monitoring well will be drilled at the ATMW-4D location following the ATMW-4D well abandonment.

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